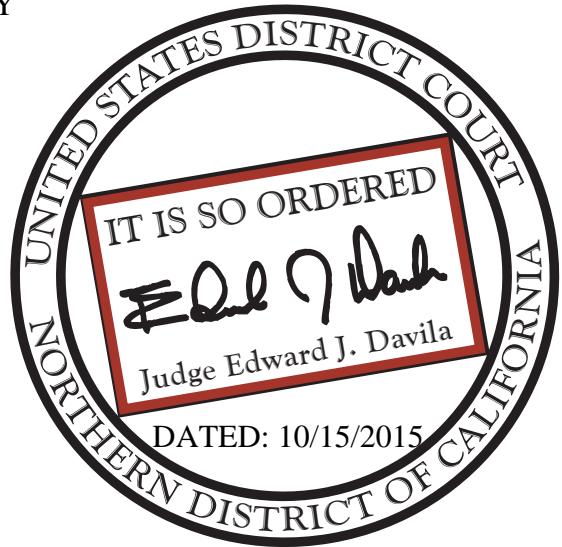


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NIA MUJADADI-TURAN



**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

NIA MUJADADI-TURAN

Plaintiff,

VS.

MOTOROLA MOBILITY, LLC;
METROPOLITAN LIFE INSURANCE
COMPANY

Defendants.

1 **JOINT STIPULATION**

2 Pursuant to Civil Local Rule 6-1, Plaintiff Nia Mujadadi-Turan (“Plaintiff”) and
3 Defendant Metropolitan Life Insurance Company (“MetLife”), hereby jointly stipulate to an
4 extension of time for MetLife to respond to Plaintiff’s Complaint. The Parties agree and
5 stipulate that MetLife will respond to Plaintiff’s Complaint on or before November 10, 2015.
6 In support of this Stipulation, the Parties agree and stipulate as follows:

7 1. On June 18, 2015, Plaintiff initiated the present action against MetLife in the
8 United States District Court for the Northern District of California. (*See* ECF Doc. No. 1).

9 2. MetLife was served with the Summons and Complaint in this action on June
10 26, 2015.

11 3. The parties submitted stipulations extending the deadline for MetLife to
12 respond to the Complaint to facilitate on-going settlement discussions. (*See* ECF Doc. Nos.
13 11, 14 and 20).

14 4. The Parties have agreed to an additional thirty (30) day extension of time for
15 MetLife to respond to Plaintiff’s Complaint. Accordingly, based on the stipulation, MetLife’s
16 response to Plaintiff’s Complaint is due on or before November 10, 2015.

17 5. The Parties are optimistic that a resolution can be reached in this matter, and
18 the additional time will afford the Parties the opportunity to explore settlement opportunities
19 without incurring additional costs of litigation. This Stipulation will not alter the date of any
20 event or deadline already fixed by Court order. Therefore, the Parties stipulate and agree to
21 extend MetLife’s deadline to respond to Plaintiff’s Complaint until November 10, 2015.

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1 Date: October 9, 2015

MAYNARD, COOPER, & GALE, LLP

2 By: /s/ C. Andrew Kitchen

3 C. Andrew Kitchen

4 Attorneys for Defendant

METROPOLITAN LIFE INSURANCE
COMPANY

5
6 Date: October 9, 2015

KANTOR & KANTOR LLP

7 By: /s/ Beth A. Davis

8 BETH A. DAVIS

9 Attorneys for Plaintiff

NIA MUJADADI-TURAN

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CERTIFICATE OF SERVICE

I am employed in the County of San Francisco State of California. I am over the age of eighteen years and not a party to this action. My business address is 275 Battery Street, Suite 1350, San Francisco, CA 94111. On September 10, 2015, I served a copy of the following documents:

**JOINT STIPULATION TO CONTINUE DEADLINE FOR METLIFE TO RESPOND
TO PLAINTIFF'S COMPLAINT**

[x] By CM/ECF ELECTRONIC SERVICE: The following are registered CM/ECF users with the Court, and have consented to service through the Court's automatic transmission of a notice of electronic filing.

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Attorneys for Defendant MOTOROLA MOBILITY, LLC

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on October 9, 2015, at San Francisco, California.

Mila Dunn